

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

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2006 DEC 12 P 4:29

DEBRA P. HACKETT, CLK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

Elaine M. Coley,

Plaintiff,

v.

ALABAMA MEDICAID AGENCY,

Defendant.

CASE no: 2:06cv378-WKW

Comes now Plaintiff and Response to Defendant's Request for Production

Attached you will find documents requested by defendant. Plaintiff request date for depositions.

Elaine N. Coley
12/12/06

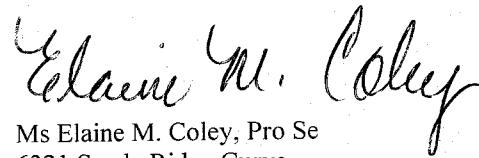
Productions of Documents

1. Attached corrective action plan instituted by Mary Finch/Linda Lackey and Interim appraisal from Mike Murphy. The performance appraisal done by Mike Murphy.
2. Medicaid Agency will have a copy of my applications that were submitted for positions I applied for.
3. See attached Memorandum date July 22, 2004 and attachment 1 dated August 27, 2003, and attachment 2 dated March 16, 2004. See request and Inter Office Memorandum dated 10/18/2004, from Kay Keeshan. See attached copy of filed grievance.
4. Please see attached copy of complaint filed with EEO, Birmingham Al. Office.
5. N/A
6. Please refer to the investigative report of Medicaid and to and attachments from production 1 and 3.
7. Please refer to previous attachments.
8. See attachments included in attached package of documents.
Letter of request from Felicia Barrow.
9. Attached copy of affidavit of Ms. Edith Todd, presently employed with the Medicaid Agency.
10. N/A
11. N/A
12. N/A
13. All attachments referred to in 2, 8, 9, and included memorandums.
14. Please see documents attached.
15. Please refer to # 14.
16. N/A.

I do hereby certify that on this 12th day of December, 2006, I filed with the Clerk of the Court a copy of the Answers to the Interrogatives and Request for Production of Documents to the Defendants. I am placing the hard copy in the mail properly addressed first class postage prepaid.

Dated: December 12, 2006,

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